

REMARKS

Claims 1-20 are pending.

Claims 1-4, 6-12, and 14-20 again stand rejected under 35 U.S.C. § 103(a) for obviousness over either a combination of U.S. Patents No. 5,991,515 to Fall et al. ("Fall") and No. 6,856,428 to Lermant et al. ("Lermant") or a combination of Fall and U.S. Patent No. 6,809,741 to Bates et al. ("Bates"). Claims 5 and 13 again stand rejected for obviousness over either a combination of Fall, Lermant, and so-called "Applicant's described Background Art", in particular page 4, line 4, of this application, or a combination of Fall, Bates, and "Applicant's described Background Art".

Clarification of the current Action mailed on January 26, 2006, is respectfully requested. A comparison of the text of the pending Action with the text of the final Action that was mailed on June 10, 2005, indicates that in substance the texts appear to be substantially identical with respect to the rejections. These rejections in the June 10 final Action were the subject of a Pre-Appeal Brief Request for Review, and were withdrawn by the Notice of Panel Decision from Pre-Appeal Brief Review that was mailed on November 16, 2005.

If the Office considers there to be differences between the rejections in the current Action and the rejections in the final Action mailed on June 10, suffice it to say that the current rejections should be reconsidered and withdrawn because none of Fall, Lermant, Bates, and the "Applicant's described Background Art" discloses or even suggests all of the features recited in Applicants' claims.

The significant differences between the cited art and the subject matters defined by the pending claims have been explained repeatedly during the prosecution of this application. Applicants' methods for formatting a document (claim 1) and formatting and compressing information contained within a document (claim 17) involve a division into multiple regions that is based on the colors of bodies of text. Such non-arbitrary division serves to preserve text color information at the same time as it eliminates the need for a separate color layer. Fall does not disclose such operation as Fall's "bands" 112 are merely non-overlapping rectangular areas that have no relation to underlying objects. Moreover, the deficiencies of Fall are not remedied by either Lermant or Bates or "Applicant's described Background Art".

As the cited combinations do not describe all of the elements of Applicants' claims, the combinations fail as bases for *prima facie* cases of obviousness against the claims.

It is believed that this application is in condition for allowance, and an early Notice of same is earnestly solicited. If the Examiner has any questions, the undersigned attorney may be telephoned at the number given below.

Respectfully submitted,

/Michael G. Savage/

Filed April 25, 2006

Michael G. Savage
Registration No. 32,596

Potomac Patent Group PLLC
P.O. Box 270
Fredericksburg, VA 22404
Tel: 919 677 9591